

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

EXXON MOBIL CORPORATION,

Plaintiff,

v.

ROBERT ANDRES BONTA A.K.A.

ROB BONTA, IN HIS INDIVIDUAL

CAPACITY; SIERRA CLUB, INC.;

SURFRIDER FOUNDATION, INC.;

HEAL THE BAY, INC.; BAYKEEPER,

INC.; AND INTERGENERATIONAL

ENVIRONMENT JUSTICE FUND LTD.

Defendants.

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Case No. 1:25-cv-00011-MJT

DECLARATION OF HOLLY BENDER

I, Holly Bender, hereby declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am over the age of 18 and have personal knowledge of the facts stated in this declaration.

2. I am the chief program officer of Sierra Club, an environmental nonprofit made up of a national organization and volunteer-led state chapters.

3. Sierra Club's mission is: to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives.

4. Sierra Club has 13 chapters entirely in California, and one chapter that serves a portion of California and all of Nevada.

5. Sierra Club has one chapter entirely in Texas, called the Lonestar Chapter, and one chapter that serves a portion of Texas and all of New Mexico.

6. Sierra Club is a nonprofit corporation organized under the laws of the State of California.

7. Sierra Club was first incorporated in California in 1892 under the directive that “the place where the principal business of said corporation is to be transacted is the City and County of San Francisco, State of California.”

8. Sierra Club is headquartered in Oakland, California, a city on the San Francisco Bay.

9. On September 23, 2024, Sierra Club filed a lawsuit against ExxonMobil in the Superior Court of California, County of San Francisco.

10. Sierra Club is unaware of any request for correction, clarification or retraction from ExxonMobil related to the statements attributed to Sierra Club in the complaint in this action filed on January 6, 2025 (the “Complaint”).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 24, 2025

By:


Holly Bender